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Attorneys for plaintiffs
DANILO MARTIN MOLIERI and
DANIEL STEVEN MOLIERI

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

DANIEL MARTIN MOLIERI and) Case No.: C10-05430 MMC
DANIEL STEVEN MOLIERI)
Plaintiff,) Complaint filed: 12/1/10
vs.)
COUNTY OF MARIN, et al.) STIPULATION AND REQUEST TO
Defendants.) EXTEND FACT DISCOVERY CUTOFF;
) (PROPOSED) ORDER

STIPULATION

Plaintiffs filed their complaint on December 1, 2010 and all parties were served and have answered. The court ordered fact discovery to be completed by December 2, 2011. Although the parties have been diligent and cooperative in conducting discovery, additional discovery is needed to prepare the case for resolution. The specific discovery items to be conducted are the depositions of San Francisco police officers Heppler and Zhang, two depositions of “persons

1 most knowledgeable, and the psychological examination of plaintiff Daniel Steven Molieri
2 related to his damages claim (emotional distress). The proposed discovery extension through
3 December 23, 2011 is not expected to affect or impose upon any other aspect of the court's
4 scheduling order, including expert discovery deadlines.

5 WHEREFORE the parties, by and through their respective counsel stipulate, agree and
6 request that, subject to approval and order of the court, the deadline for completing the above-
7 referenced discovery will be extended to and including December 23, 2011.

8 LAW OFFICES OF JOHN L. BURRIS

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10 Dated: November 30, 2011

/S/JOHN L. BURRIS _____
11 Attorneys for Plaintiffs
DANILO MARTIN MOLIERI and
12 DANIEL STEVEN MOLIERI

13 PATRICK K. FAULKNER,
14 COUNTY COUNSEL

15

16 Dated: November 30, 2011

/S/RENEE GIACOMINI BREWER _____
17 Attorneys for Defendant
COUNTY OF MARIN

18 DENNIS J. HERRERA,
19 CITY ATTORNEY

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21 Dated: November 30, 2011

/S/MICHAEL GERCHOW _____
22 Attorneys for Defendant
CITY AND COUNTY OF SAN FRANCISCO

ORDER

The court having considered the stipulation of the parties and good cause appearing,

IT IS ORDERED that the deadline for completing fact discovery is modified to permit the depositions and discovery specified in the parties stipulation to be completed no later than December 23, 2011. The court's scheduling order is not modified in any other particular.

Dated: December 1, 2011

Majine M. Cheaney
UNITED STATES DISTRICT JUDGE